

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE APPLICATION OF
CHANGPENG ZHAO FOR AN ORDER
TO TAKE DISCOVERY FOR USE IN A
FOREIGN PROCEEDING PURSUANT
TO 28 U.S.C. § 1782

Case No. ____ Misc. ____

**DECLARATION OF PEM C. TSHERING IN SUPPORT OF
PETITION FOR DISCOVERY FOR USE IN A FOREIGN PROCEEDING
PURSUANT TO 28 U.S.C. § 1782**

I, Pem C. Tshering, hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney licensed to practice law in the State of New York. I am a Managing Associate in the law firm of Sidley Austin LLP, which represents Petitioner Changpeng Zhao. I make this declaration in support of Petitioner's Application for an Order Pursuant to 28 U.S.C. § 1782 to Conduct Discovery For Use in a Foreign Proceeding.

2. Petitioner brings this Application to obtain limited discovery under 28 U.S.C. § 1782 from Bloomberg L.P. and Bloomberg Inc. (collectively, the "Respondents").

3. Petitioner seeks the discovery for use in a litigation pending before the Hong Kong Court of First Instance ("Hong Kong Court") concerning certain defamatory statements about Petitioner that was published by the Modern Media Company Limited (the "Litigation Respondent").

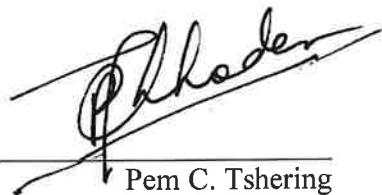
4. Attached hereto are true and correct copies of the following documents:

Exhibit	Description
A	Proposed order authorizing the Petitioner to obtain the limited discovery requested from the Respondents
B	Notice of Subpoena, Subpoena, and Attachment A to the Subpoena proposed to be served on Bloomberg L.P.
C	Notice of Subpoena, Subpoena, and Attachment A to the Subpoena proposed to be served on Bloomberg Inc.

D	Notice of Deposition and Attachment A to the Notice of Deposition proposed to be served on Bloomberg L.P.
E	Notice of Deposition and Attachment A to the Notice of Deposition proposed to be served on Bloomberg Inc.
F	Bloomberg L.P.'s Registered Entity Information and Incorporation Documents
G	Bloomberg Inc.'s Registered Entity Information and Incorporation Documents

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed in Singapore on July 25, 2022.



Pem C. Tshering